

-HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY-

Exhibit 302

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SPECTRUM DYNAMICS MEDICAL LIMITED,

Plaintiff,

Case No.: 18-cv-11386 (VSB)

v.

GENERAL ELECTRIC COMPANY, GE
HEALTHCARE, INC., GE MEDICAL SYSTEMS
ISRAEL LTD., JEAN-PAUL BOUHNIK,
SERGIO STEINFELD, ARIE ESCHO, NATHAN
HERMONY, and YARON HEFETZ,

Defendants.

**DECLARATION OF JEAN-PAUL BOUHNIK IN OPPOSITION TO PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION**

I, Jean-Paul Bouhnik, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over eighteen years of age, competent to testify to the matters stated herein, and state the following based on my personal knowledge, information, and belief.
2. I am a Defendant in the above-captioned matter and submit this declaration in support of Defendants' Opposition to Plaintiff's Motion for Preliminary Injunction.
3. I am currently the Chief Physicist and Advanced Technology Leader (Molecular Imaging) for GE Healthcare, Inc. in Israel. I have been an employee of GE since 1997 in various roles related to its nuclear medicine products, research and development.

GE's History of CZT-Based SPECT Technology

4. Although I was not employed at GE before 1997, I understand that GE has a long history of developing and selling SPECT imaging systems that dates back to the 1970s. By the 1990s, GE had advanced to developing and selling hybrid SPECT/CT devices. [REDACTED]

[REDACTED] (See Ex. 315 at

GE_SDM_00362129.) The Hawkeye was capable of gathering information on a patient's organ

anatomy through CT acquisition and obtaining information concerning the physiological function of the organ using SPECT acquisition.

5. Even before launching Hawekeye, GE was investigating the use of Cadmium Zinc Telluride (“CZT”) as a detector material. In 1995, Elscint (which GE later acquired) worked with Imarad to develop [REDACTED]. This led to the development of a prototype handheld probe using CZT that GE used for clinical research in 2001. [REDACTED]

[REDACTED] Around 2003, GE developed a CZT-based cardiac system, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] The CZT detector modules that GE has used for these CZT-based devices and for its subsequent devices were all assembled from 4 cm x 4 cm CZT modules, which I understand to be the standard module size in the field.

6. [REDACTED]
[REDACTED]

(See Ex. 315 at GE_SDM_00362129.) The CZT 530 was a SPECT device, while the CZT 570 was a hybrid SPECT/CT device. Both were launched in 2009 and designed for cardiology applications.

7. In fact, based on GE’s experience with using CZT in the early 2000s when the manufacturing of CZT was still immature, GE explored acquiring a CZT manufacturer to internalize manufacturing, advance the development of the technology and reduce supply constraints. In November 2010, GE announced that it planned to acquire Orbotech Medical Solutions, one of the leading suppliers of CZT modules to the industry. [REDACTED]

[REDACTED] (Ex. 317 at GE_SDM_00424811.) This acquisition allowed GE to act as a CZT supplier to others in the field, [REDACTED]

[REDACTED] (Ex. 318.)

8. Even during the due diligence, GE continued to independently develop CZT-based products. In 2012, after nearly a decade of research and development using [REDACTED]

[REDACTED], GE launched the Discovery NM 750b (the “750b”). [REDACTED]

[REDACTED] (See Ex. 315 at GE_SDM_00362129.) Development of the 750b, [REDACTED]

9. [REDACTED]

[REDACTED] (See *id.*) The

CZT 670 was later renamed the CZT 870. The CZT 670 was GE’s first CZT-based SPECT general purpose camera and featured two large detectors each comprised of 130 4cm x 4cm CZT modules. The detector panels may rotate around the patient and can be swiveled to define either an H or L geometry depending on the clinical need. In the following years, GE continued to optimize the CZT 670. [REDACTED]

Due Diligence with Spectrum

10. By 2009, GE was continuing to develop its CZT-based products and was already working towards development of a general purpose camera (“GPC”). [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] GE had already demonstrated its capability to develop dedicated CZT devices, like the CZT 530 and CZT 570c cardiac devices,

(See Ex. 54 at GE_SDM_00203618-21; see also Ex. 315 at GE_SDM_00362129.)

11. [REDACTED]

[REDACTED]. (See Ex. 43.) [REDACTED]

[REDACTED] (Id. at GE_SDM_00386681.) [REDACTED]

[REDACTED] In parallel, GE re-initiated discussions with Spectrum, following on from prior negotiations between [REDACTED]

[REDACTED] (See Ex. 43.) I understand that GE entered into a Mutual Confidentiality and Non-Use Agreement with Spectrum Dynamics Limited in September 2009 and the due diligence progressed from that point through August 2010 and resumed in late 2011 and early 2012.

12. [REDACTED]

[REDACTED] (See Ex. 325.) [REDACTED]

[REDACTED]

[REDACTED] (*Id.*) [REDACTED]

[REDACTED]

[REDACTED] disclosed in its U.S. Patent No. 7,592,597. (*See* Ex. 314.)

13. During the due diligence with Spectrum, I participated in several due diligence meetings with Spectrum representatives, including Messrs. Roth, Zilberstien, and Yoeli. In general, during these meetings we discussed different topics concerning GE's interest in [REDACTED]

[REDACTED] I also exchanged many emails with Spectrum's representatives as part of the due diligence process.

14. Shortly after an initial due diligence meeting with Spectrum on September 16, 2009, which I did not attend, [REDACTED]

[REDACTED] (*See* Ex. 200.) As a general rule, simulation involves four phases: (a) design the system specifications and geometry to simulate; (b) obtain data that is used to assess the imaging performance of the simulated imaging system, generally known as a "phantom"; (c) use the simulation system to generate projection data from the phantom data; and (d) reconstruct the raw projection data into an image. The reconstructed image can then be evaluated to assess the imaging performance of the simulated system. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] (See *id.* at GE_SDM_00286579.) Mr. Jansen's work demonstrates that even in September 2009, GE was able to simulate a [REDACTED] and reconstruct images from those simulations without input from Spectrum.

15. In June 2010, following several months of due diligence in which Spectrum shared information with GE through a data room and GE analyzed that information and simulated Spectrum's claimed [REDACTED], an in-person due diligence meeting was held at Spectrum's facilities. My recollection is that, to prepare for that meeting, Mr. Jansen had prepared simulations of Spectrum's D-SPECT and simulations of Spectrum's [REDACTED] design based on his understanding of Spectrum's [REDACTED] design specifications, such as the [REDACTED]
[REDACTED]

16. I attended the onsite due diligence meeting from June 15-17, 2010. During the meeting, we were shown Spectrum's manufacturing floor for the D-SPECT and also discussed with Spectrum Mr. Jansen's simulations. There were discussions about using different phantoms to simulate the [REDACTED] design and develop reconstructed images and Spectrum provided Mr. Jansen with [REDACTED] We did not discuss and Spectrum did not disclose to us any unique collimator design, such as using [REDACTED]
[REDACTED]. I do not recall that Spectrum showed GE any simulations of its [REDACTED] design during this meeting.

17. On June 22, 2010, a few days after the on-site meetings concluded, Nathan Hermony forwarded me an email that he had sent to Mr. Jansen and Alex Ganin the prior day. [REDACTED]
[REDACTED]

[REDACTED] (Ex. 134 at GE_SDM_00550472.) [REDACTED]

18. [REDACTED]

[REDACTED] (Ex. 97 at GE_SDM_00012346.) [REDACTED]

[REDACTED] (*See id.* at GE_SDM_00012345.) I was copied on Mr. Jansen's response, which he sent on June 29, 2010, [REDACTED]

[REDACTED] (*See Ex. 65 at SDML_00038343.*)

19. In response to Mr. Jansen's email, Spectrum's Nathaniel Roth provided some clarifications of both the D-SPECT geometry (which Mr. Jansen was also simulating at GE) and the [REDACTED] design. (*See Ex. 66 at SDML_0038353-54.*) Among the information provided, Mr. Roth clarified the [REDACTED] (*See id.* at SDML_0038353.)

Mr. Jansen replied that he would adjust his simulation set up and use the new information "as a starting point in [his] simulations." (*Id.* at SDML_00038352.)

20. After these emails, [REDACTED]

[REDACTED] (*See Ex. 154 at GE_SDM_00005376.*)

[REDACTED]

[REDACTED] (See *id.*; see also Ex. 349.) [REDACTED]

[REDACTED] (See Ex. 349 at

GE_SDM_00005356.)

21. I attended the meeting, which occurred on July 29, 2010 along with Mr. Jansen, Mr. Ganin, and several others from GE. Mr. Jansen presented the results of his [REDACTED] simulations and the reconstructed images using GE's phantom projections. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See *id.* at GE_SDM_00005377.) As I recall, Spectrum was impressed with the results from Mr. Jansen's [REDACTED] simulation because [REDACTED]

[REDACTED] would perform.

22. During the meeting, [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 154 at GE_SDM_00005377.) As I recall, even at the July 2010 meeting, Spectrum did not present any simulations of the [REDACTED] and they wanted GE's phantom and bone projections derived from GE's simulations to prepare reconstructed images. [REDACTED]

[REDACTED] (See *id.* at GE_SDM_00005376.)

23. At this point, the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED] (See Ex. 154 at GE_SDM_00005377.)

24. Despite this, GE proceeded with the plan developed during the July 2010 meeting and Mr. Jansen prepared the phantom and projection data to share with Spectrum. (See Ex. 64.)
[REDACTED]

[REDACTED] On August 3, 2010, I forwarded Mr. Jansen's data to Spectrum in a PowerPoint describing GE's simulation set up, projection data and phantoms that had been discussed with Spectrum in July, as well as link to a zip file containing the raw data for the phantom and projections. (See *id.*) [REDACTED]

[REDACTED] As Mr. Jansen explained, he tailored the projections data to meet Spectrum's specifications, including using their proposed [REDACTED], which I note because GE did not use an [REDACTED] in its earlier systems or in the StarGuide. (See *id.*)

25. On August 16, 2010, Spectrum sent us the first results, including reconstructed images, which they prepared using the phantom data and projections that Mr. Jansen prepared for them. (See Ex. 60.) These results differed in some respects from the results that GE obtained from its own simulations, including that Spectrum's [REDACTED]
[REDACTED] from the bone scan phantom. (See *id.* at SDML_01168806, SDML_01168809.) [REDACTED]

[REDACTED] As a result, Mr. Roth worked with Mr. Jansen in the latter half of August to attempt to explain the differences and match up each side's results. (See Ex. 61.)

26. Spectrum's [REDACTED]
[REDACTED]. This

was different than what GE had assumed and previously simulated to generate the projections from July 2010 and which were sent to Spectrum to reconstruct. Additionally, when Spectrum processed the phantom data, it altered the data to fit its reconstruction system. (*See id.* at SDML_00263114.) Further, Spectrum had defined the detector geometry differently than GE had understood and simulated it. (*Id.*)

27. As a result of these differences, Mr. Jansen agreed to provide Spectrum with new data files for Spectrum to use in reconstructing images. This new data included running a new simulation and generating new projections based on different collimator types, including using Spectrum's [REDACTED], and based on new detector geometry. (*Id.*) Mr. Jansen also agreed to generate new phantom data that was specific to fit Spectrum's reconstruction capabilities so that Spectrum would not have to alter the data. (*Id.*)

28. [REDACTED]
[REDACTED]
[REDACTED] (See Ex. 348).
[REDACTED]
[REDACTED]
[REDACTED]

29. Shortly after this, [REDACTED]

(See Ex. 359.) These [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] (See *id.*) In connection with this discussion, I decided to review the [REDACTED] from Spectrum's August 16, 2010 simulation results. I looked at the [REDACTED]
[REDACTED] (Ex. 60 at SDML_01168806) and compared that to the actual phantom data that Mr. Jansen had sent. [REDACTED]

[REDACTED] (See Ex. 360.)
[REDACTED]
[REDACTED]. (*Id.*) [REDACTED]
[REDACTED]

30. A few weeks after [REDACTED], Spectrum sent GE some additional results in which they revealed that they had used yet another [REDACTED]

[REDACTED] (Ex. 62.)
The results of these simulations showed that Spectrum [REDACTED]
[REDACTED]
[REDACTED]. (See *id.* at SDML_00038321.) [REDACTED]
[REDACTED]

[REDACTED] (See Ex. 63.) Spectrum itself, however, concluded that it needed to [REDACTED] (Ex. 62 at SDML_00038321.)

31. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 361.) [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 69.)

32. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] It was clear that Spectrum did not have a clear path toward achieving those results, particularly with respect to collimator design. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Moreover, using an [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] It

was apparent, at this time, that Spectrum had not considered that problem and was [REDACTED]

[REDACTED]

[REDACTED]

33. After this period of exchanging data [REDACTED]
[REDACTED] (see Ex. 359), the due diligence slowed until early 2012. By this time, Spectrum had apparently been able to [REDACTED]
[REDACTED]
[REDACTED] These changes were conveyed to GE during a handful of due diligence meetings that began with a three-day due diligence meeting from January 24-26, 2012 [REDACTED]
(See, e.g., Ex. 363 [REDACTED];
Ex. 364 [REDACTED]; Ex. 365 [REDACTED]
[REDACTED]
[REDACTED] (See Ex. 366 [REDACTED]);
Ex. 367 [REDACTED]
[REDACTED]
[REDACTED] (See Exs. 367-368.) [REDACTED]
[REDACTED]

34. During these meetings, Spectrum described how it [REDACTED]
[REDACTED] At no time, however, did Spectrum explain to GE that it had also [REDACTED]
[REDACTED] That would have been a significant revelation to GE
[REDACTED]
[REDACTED] (see Ex. 347) and filed a patent application for that exact idea in December 2011. (See Ex. 346.)

35. As had occurred in September 2010, Spectrum shared some reconstructed images based on its simulations of phantom data [REDACTED]

[REDACTED] (See Ex. 363.) [REDACTED]

[REDACTED]
[REDACTED]
See Ex. 367.) [REDACTED]

[REDACTED] (See Ex. 369.) In the past reconstructions, which were digital bone phantoms, Spectrum [REDACTED]

[REDACTED] (see Exs. 60, 62), [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] (See Ex. 96.) There was no discussion or indication from Mr. Roth or anyone else at Spectrum that the better images [REDACTED]

36. As I recall, Riyad Mahameed worked closely with Spectrum [REDACTED]
[REDACTED] and Mr. Mahameed presented the plan to business leaders at GE. My understanding is that following this presentation, the business continued the negotiations with Spectrum [REDACTED]

[REDACTED]

37. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See Pl. Ex.)

96.) [REDACTED]

[REDACTED] (See Ex. 370.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

GE's Development of Simulation Tools in Israel

38. As explained above, GE had extensive simulation and reconstruction software that it used to simulate various system configurations and compare those to GE's existing systems. Most of this was done with Mr. Jansen, who was not located in Israel, and who had many responsibilities for different projects. Because Mr. Jansen could not and was not expected to dedicate his simulation work to the work that GE's Israel team was performing, the team in Israel decided it would be best to build its own simulation and reconstruction team. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See, e.g., Ex. 371 [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

39. We did not use any Spectrum software to develop this simulation software at GE, nor had we even received any Spectrum software for simulations or reconstruction. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 81 at
GE_SDM_00254415-23.) [REDACTED]

[REDACTED]

[REDACTED] (See, e.g., Ex. 384.) [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] No aspect of our simulation or reconstruction software was based on or used information from Spectrum.

Development of StarGuide

40. GE's StarGuide incorporates features and functions that GE has independently developed through more than a decade of research, experimentation, refinement, and application, as well as features that have been well-known in the field of nuclear medicine for many years.

[REDACTED]

41. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See Ex. 327 at GE_SDM_00258168.)

42. Prior to the 2009 due diligence with Spectrum, [REDACTED]

[REDACTED]

[REDACTED] (Ex. 325.) [REDACTED]

[REDACTED]

[REDACTED] (Id.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (Id.) [REDACTED]

[REDACTED] like the idea in the '597 patent. (See *id.*; see also Ex. 314).

[REDACTED]

[REDACTED].

43. In November 2009, after the due diligence with Spectrum began, GE continued to consider its own GPC designs during internal brainstorming sessions. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 199 at GE_SDM_00286401.)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See *id.*)

44. [REDACTED]

[REDACTED]

[REDACTED] (Ex. 154 at GE_SDM_00005377.)

45. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 328 at GE_SDM_00366667.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See *id.*) [REDACTED]

[REDACTED]

[REDACTED] (*Id.*)

46. [REDACTED]

[REDACTED] (See *id.*) [REDACTED]

[REDACTED] (See *id.* at GE_SDM_00366665-66.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See *id.* at GE_SDM_00366664.) [REDACTED]

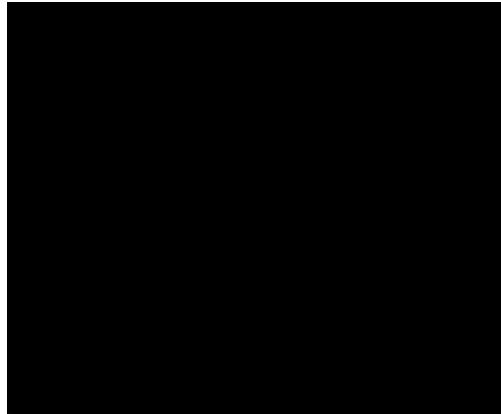
[REDACTED] (See *id.* at GE_SDM_00366664.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



(See *id.*)

47. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 329-330.) [REDACTED]

[REDACTED]

[REDACTED] (Ex. 329.) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See *id.*) [REDACTED]

[REDACTED]

[REDACTED] (*Id.*)

48. [REDACTED]

[REDACTED]

[REDACTED]

The image consists of ten horizontal black bars arranged vertically. The bars decrease in length from top to bottom. The top nine bars are of equal length, while the bottom bar is significantly shorter, ending approximately halfway down the page.

49. The number of CZT modules per column involves similar practical considerations such as the cost of CZT modules and the needs of the system (i.e., ability to scan different size organs). The cost of CZT modules is a particularly important consideration – using too many modules makes the design cost-prohibitive and is larger than necessary for any realistic clinical circumstance.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See *id.*) [REDACTED]

[REDACTED]

[REDACTED]

50. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 49 at GE_SDM_00440065; Ex. 50 at GE_SDM_00440574.) [REDACTED]

[REDACTED] (See Ex.

314 at 5:59-6:18.)

51. [REDACTED]

[REDACTED] (Ex. 50 at GE_SDM_00440574.)

52. [REDACTED]

[REDACTED] (See *id.*)

53. [REDACTED]

[REDACTED]

[REDACTED] (See Ex. 50 at GE_SDM_00440573-74.)¹ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ [REDACTED] (See *id.* at GE_SDM_00440574.)

54. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

55. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

56. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

57. [REDACTED]

[REDACTED] (Ex. 48 at GE_SDM_00440338.) [REDACTED]

[REDACTED] (See *id.*) This design concept is completely different than anything discussed with Spectrum in either 2010 or 2012

[REDACTED] (see Ex. 347), [REDACTED]

(see Ex. 346), [REDACTED]

[REDACTED] (See, e.g., Exs. 158, 159, 162, 163, 164; Ex. 372.)

58. Before the due diligence with Spectrum resumed in January 2012, [REDACTED]

[REDACTED] (See Ex. 347 at GE_SDM_00739480). [REDACTED]

[REDACTED] (See *id.*) [REDACTED]

[REDACTED] (See, e.g., Ex. 159 at GE_SDM_00194077 [REDACTED])

² [REDACTED]

(See *id.*)

, Mr. Blevis filed a patent application for this very concep

(See Ex. 346.)

59. After the due diligence with Spectrum concluded, we worked extensively to identify and optimize a collimator to use in StarGuide. [REDACTED]

A series of 12 horizontal black bars of varying lengths, decreasing from top to bottom. The bars are evenly spaced and extend across the width of the frame.

60.

Four solid black rectangular boxes arranged vertically, used to redact sensitive information from the document.

61

ANSWER The answer is (A). The first two digits of the number 1234567890 are 12.

[REDACTED] (See Exs. 158-159, 162-164); Ex. 372.) [REDACTED]

[REDACTED] (See Ex.
_372.) [REDACTED]

[REDACTED] (See Ex. 374 at GE_SDM_00739459.) We did not use collimator information that Spectrum shared in the due diligence.

62. [REDACTED]

[REDACTED] (Ex. 159 at GE_SDM_00194077 [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] (See id. [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] (See id.) [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] (See id.) [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

63. [REDACTED]

[REDACTED]
[REDACTED] (see [REDACTED]

Ex. 162 at GE_SDM_00286072 [REDACTED]

[REDACTED] (See id. [REDACTED])

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See Ex. 164 [REDACTED])

[REDACTED]

[REDACTED]

[REDACTED] (See id.)

64. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See Ex. 372.)

65. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (See Ex. 48.)

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: October 26, 2021.



Jean-Paul Bouhnik

Declaration of Jean-Paul Bouhnik: Appendix A**Index of Exhibits**

Exhibit Number	Description
43	Email dated July 6, 2009 from Riyad Mahameed to Lana Volokh and Jean-Paul Bouhnik (containing in the chain an email dated July 6, 2009 from Riyad Mahameed (GE Healthcare) to Alexander Ganin (GE Healthcare) FW: next term GRC priorities) (GE_SDM_00386680-82). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
49	GE Healthcare 510(k) Premarket Notification Submission - Section 5: 510(k) Summary - Star Guide (GE_SDM_00440061-68). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
50	GE Healthcare 510(k) Premarket Notification Submission - Section 16: Software - StarGuide (GE_SDM_00440568-1068). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
54	Email dated August 27, 2009 from Riyad Mahameed (GE Healthcare) to Kristen A Wangerin (GE Research), Alexander Ganin (GE Healthcare), Floris P Jansen (GE Research), Ravindra Manjeshwar (GE Healthcare), Nathan Hermony (GE Healthcare), Osnat Zak (GE Healthcare) and Jean-Paul Bouhmik (GE Healthcare) RE: CEOReview_Sept8_v7_without_YUpdates.ppt including an attachment/NUC SII 2009 PowerPoint presentation (GE_SDM_00203614-22). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
60	Email dated August 16, 2010 from Nathaniel Roth to Floris Jansen (GE Global Research), Alexander Ganin (GE Healthcare), Jean-Paul Bouhnik (GE Healthcare), Yoel Zilberstien, Ran Ravhon, and Gilad Yoeli Re: [REDACTED] simulation including an attachment/PowerPoint presentation titled "Spectrum Dynamics GPC Simulations" (SDML_01168791-816). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
61	Email dated August 26, 2010 from Nathaniel Roth to Floris P Jansen (GE Global Research), Alexander Ganin (GE Healthcare), Jean-Paul Bouhnik (GE Healthcare), Ravindra Manjeshwar (GE Global Research), Yoel Zilberstien, Ran Ravhon, and Gilad Yoeli RE: GPC simulation (SDML_00263114-16). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)

Exhibit Number	Description
62	Email dated September 12, 2010 from Nathaniel Roth to Floris Jansen (GE Global Research), Alexander Ganin (GE Healthcare), Jean-Paul Bouhnik (GE Healthcare), Ravindra Manjeshwar (GE Global Research), Yoel Zilberstien, Ran Ravhon, and Gilad Yoeli RE: [REDACTED] Simulation including an attachment/PowerPoint presentation titled "Spectrum Dynamics GPC Simulations" (SDML_00038321-41). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
63	Email dated September 13, 2010 from Nathan Hermony to Jean-Paul Bouhnik, Riyad Mahameed, and Arie Eshco RE: [REDACTED] simulation (containing in the chain an email dated August 25, 2010 from Floris P Jansen (GE Global Research) to Nathaniel Roth, Alexander Ganin (GE Healthcare), Jean-Paul Bouhnik (GE Healthcare), Ravindra Manjeshwar (GE Global Research), Yoel Zilberstien, Ran Ravhon, and Gilad Yoeli RE: GPC simulation; and an email dated September 12, 2010 from Nathaniel Roth to Floris Jansen (GE Global Research), Alexander Ganin (GE Healthcare), Jean-Paul Bouhnik (GE Healthcare), Ravindra Manjeshwar (GE Global Research), Yoel Zilberstien, Ran Ravhon, and Gilad Yoeli RE: GPC simulation) (GE_SDM_00366546-49). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
64	Email dated August 3, 2010 from Jean-Paul Bouhnik to Yoel Zilberstien, Floris P Jensen, Alexander Ganin, and Shuchi Varandani RE: project data (containing in the chain an Email dated August 3, 2010 from Floris Jansen to Jean-Paul Bouhnik (GE Healthcare), Alexander Ganin (GE Healthcare), and Ravindra Manjeshwar (GE Global Research) RE: projection data including an attachment/PowerPoint presentation "Spotlight simulations – data conventions – August 2010" by Floris Jansen) (SDML_00733345-53). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
65	Email dated June 30, 2010 from Nathaniel Roth to Floris P Jansen (GE Research), Yoel Zilberstien, Jean-Paul Bouhnik (GE Healthcare), Alexander Ganin (GE Healthcare), and Shuchi Varandani (GE Healthcare) RE: Yoel including an attachment/PowerPoint presentation "Spotlight Simulations" dated June 2010 by Floris Jansen (SDML_00038342-50). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
66	Email dated July 4, 2010 from Nathaniel Roth to Floris P Jansen (GE Global Research, Yoel Zilberstien, Jean-Paul Bouhnik (GE Healthcare), Alexander Ganin (GE Healthcare), and Shuchi Varandani (GE Healthcare) RE: Yoel (SDML_00038351-55). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)

Exhibit Number	Description
69	Email dated September 20, 2010 from Floris P Jansen (GE Global Research) to Yoel Zilberstien, Alexander Ganin (GE Healthcare), Ravindra Manjeshwar (GE Global Research), Jean-Paul Bouhnik (GE Healthcare), Riyad Mahameed (GE Healthcare), Suchi Varandani (GE Healthcare), and Nathan Hermony (GE Healthcare) RE: [REDACTED] Simulation (GE_SDM_00005088-92). (CONFIDENTIAL)
81	Email dated August 20, 2012 from Yariv Grobshtein to Riyad Mahameed (GE Healthcare) Re: [REDACTED] – FW34 2012 including an attachment/PowerPoint presentation titled “Photon History Randomization” (GE_SDM_00254414-23). (HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY)
96	Email dated February 24, 2013 from Jean-Paul Bouhnik (GE Healthcare) to Reuven Brenner (GE Healthcare), Riyad Mahameed (GE Healthcare) and Gil Kovalski (GE Healthcare) RE: recon (GE_SDM_00017481-82). (HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY)
97	Email dated June 24, 2010 from Alexander Ganin (GE Healthcare) to Floris P Jansen (GE Research), Shuchi Varandani (GE Healthcare) and Jean-Paul Bouhnik (GE Healthcare) RE: Yoel (GE_SDM_00012345-46). (HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY)
134	Email dated June 22, 2010 from Nathan Hermony to Erez Levy, Riyad Mahameed, Reuven Brenner, Jean-Paul Bouhnik, and Arie Eshco RE: Spotlight – 6/17 Report Out Deck (GE_SDM_00550471-73). (HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY)
154	Email dated August 1, 2010 from Alexander Ganin (GE Healthcare) to Jean-Paul Bouhnik (GE Healthcare), Floris Jansen (GE Global Research), Riyad Mahameed (GE Healthcare), Nathan Hermony (GE Healthcare), Aharon Peretz (GE Healthcare), Osnat Zak (GE Healthcare), Reuven Brenner (GE Healthcare), Tzachi Rafaeli (GE Healthcare), Terri Bresenham (GE Healthcare, GE Officer), and Shuchi Varandani (GE Healthcare) RE: spotlight visit – review of simulation (GE_SDM_00005376-77). (HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY)
158	Email dated May 8, 2013 from Jean-Paul Bouhnik to Leonid Tsukerman, Michael Kogan, Ormit Amir, Tzachi Rafaeli, Yulim Zingerman, and Yariv Grobshtein RE: Weekly Physics’ “Happy hour” including an attachment/spreadsheet “collimator design for GPC.xlsx” (GE_SDM_00241609-10). (HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY)

Exhibit Number	Description
159	Spreadsheet file named "collimator design for GPC July31 – Copy.xlsx" (GE_SDM_00194077). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
162	Email dated June 24, 2014 from Jean-Paul Bouhnik to Yariv Grobshtein including an attachment/spreadsheet file named "collimator design for GPC may2014.xlsx" (GE_SDM_00286071-72). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
163	Spreadsheet file named "collimator design for GPC may2014.xlsx" (GE_SDM_00285191). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
164	Email dated December 6, 2015 from Jean-Paul Bouhnik (GE Healthcare) to Riyad Mahameed (GE Healthcare) (GE_SDM_00201234) including an attachment/spreadsheet named "collimator design for GPC august 2014.xlsx" (GE_SDM_00201235). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
182	Email dated July 3, 2018 from Jean-Paul Bouhnik to Reuven Brenner RE: FW Stargate content (GE_SDM_00319563-64) including an attachment/spreadsheet file named "Stargate requirements.xlsx" (GE_SDM_00319565). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
199	Email dated November 25, 2009 from Ravindra Manjeshwar (GE Research) to Alexander Ganin (GE Healthcare), Lana Volokh (GE Healthcare), Yigal Shrem (GE Healthcare), Jonathan Sachs (GE Healthcare), Jean-Paul Bouhnik (GE Healthcare), Ira Blevis (GE Healthcare), Leonish Tsukerman (GE Healthcare), Osnat Zak (GE Healthcare), Riyad Mahameed (GE Healthcare), Aharon Peretz (GE Healthcare), Sinan Awad (GE Healthcare), Kristen A (GE Research), Jorge Uribe (GE Research), Evren Asma (GE Research), Hua Qian (GE Research), Sergei Dolinsky (GE Research), Floris P Jansen (GE Research) Yanfeng Du (GE Research), and Jeffrey S Gordon (GE Research) RE: Notes from Nuc Brainstorming session (GE_SDM_00286375-76) including 5 attachments/presentations (GE_SDM_00286377-381, 385-403). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)
200	Email dated September 25, 2009 from Nathan Hermony to Riyad Mahameed, Jean-Paul Bouhnik, and Erez Levy RE: FW: GP simulations 3 including an attachment/PowerPoint presentation titled "GP simulations" (GE_SDM_00286577-97). (HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY)

Exhibit Number	Description
314	U.S. Patent No. 7,592,597 to Hefetz et al. (GE_SDM_00570315 - GE_SDM_00570327).
315	PowerPoint titled "GEMS_Company Presentation_OCS_12-03-19 - JP.pptx" (GE_SDM_00362118 - GE_SDM_00362224). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
317	PowerPoint titled "MIU3 CZT Update Feb 2011 v1.ppt" (GE_SDM_00424808 - GE_SDM_00424859). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
318	Document titled "SD New contract - cost reduction.pdf" (GE_SDM_00346895 - GE_SDM_00346939). (Confidential)
325	Email dated June 17, 2009 from Ira Blevis to Riyad Mahameed, Jean-Paul Bouhnik, and Jonathan Sachs RE: summary: GP-czt (GE_SDM_00286902 - GE_SDM_00286902). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
327	PowerPoint titled "Patent - JP 2008.ppt" (GE_SDM_00285162 - GE_SDM_00285168). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
328	Email dated August 4, 2010 from Floris Jansen to Jean-Paul Bouhnik, and Alexander Ganin RE: RE: spotlight visit - review of simulation (GE_SDM_00366664 - GE_SDM_00366669). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
329	PowerPoint titled "GPCZT options.ppt" (GE_SDM_00317988 - GE_SDM_00317991).
330	Email dated September 13, 2010 from Nathan Hermony to Jean-Paul Bouhnik, and Riyad Mahameed RE: RE GPCZT options.ppt (GE_SDM_00733818 - GE_SDM_00733818). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
346	U.S. Patent Application No. 13/338,930 to Wartski et al., filed December 28, 2011, Pub. No. US 2013/0168567, published July 4, 2013 (GE_SDM_00739466 - GE_SDM_00739479).

Exhibit Number	Description
347	Email dated March 1, 2011 from Ira Blevis to Osnat Zak, Nurit Wartski, Jean-Paul Bouhnik, Tzachi Rafaeli, Aharon Peretz, and Reuven Brenner RE: RE MBI collimator Optimization, including attachment spreadsheet titled "collimatorsummaryTable GE-GM.xls" (GE_SDM_00739480 - GE_SDM_00739481). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
348	Email dated August 29, 2010 from Riyad Mahameed to Sabrina Solomon and Jean-Paul Bouhnik RE: FW: [REDACTED] simulation (GE_SDM_00366615 - GE_SDM_00366618). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
349	Email dated August 2, 2010 from Yoel Zilberstien to Shuchi Varandani and Jim Haisler RE: FW: Yoel (GE_SDM_00005355 - GE_SDM_00005358). (Confidential)
359	Email dated August 30, 2010 from Floris Jansen to Nathaniel Roth, Jean-Paul Bouhnik, Ravindra Manjeshwar, and Ran Ravhon RE: RE: [REDACTED] simulation, [Native Attachments Omitted] (GE_SDM_00366607 - GE_SDM_00366614). (Confidential)
361	Email dated September 15, 2010 from Floris Jansen to Nathaniel Roth, Yoel Zilberstien, Jean-Paul Bouhnik, Ravindra Manjeshwar, Alexander Ganin, and Riyad Mahameed RE: RE: [REDACTED] simulation, [Native Attachments Omitted] (GE_SDM_00108519 - GE_SDM_00108524). (Confidential)
363	Email dated January 30, 2012 from Jean-Paul Bouhnik to Nathaniel Roth and Riyad Mahameed RE: RE Striatal digital phantom (SDML_01179877 - SDML_01179877). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
364	Email dated February 6, 2012 from Arie Eshco to Arie Eshco, Yoel Zilberstien, Nathaniel Roth, Riyad Mahameed, Jean-Paul Bouhnik, Sergio Steinfeld, Sinan Awad, and Sabrina Solomon RE: [REDACTED] work plan, assumption and planning (GE_SDM_00133809 - GE_SDM_00133809). (Confidential)
365	Email dated February 6, 2012 from Arie Eshco to Arie Eshco, Riyad Mahameed, Yoel Zilberstien, Jean-Paul Bouhnik, Sabrina Solomon, Reuven Brenner, Aharon Peretz, Nathan Hermony, and Nathaniel Roth RE: [REDACTED] follow up (GE_SDM_00133810 - GE_SDM_00133810). (Confidential)

Exhibit Number	Description
366	Email dated February 9, 2012 from Riyad Mahameed to Jean-Paul Bouhnik RE: FW: Draft, including 1 attachment spreadsheet titled "████ Riyad - SD Feb 9.xls" (GE_SDM_00289722 - GE_SDM_00289724). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
367	Email dated February 13, 2012 from Jean-Paul Bouhnik to Nathaniel Roth Riyad Mahameed, Aharon Peretz, Reuven Brenner, Arie Eshco RE: acceptance, including 1 attachment titled "acceptance.ppt" (SDML_00377316 - SDML_00377318). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
369	Email dated February 14, 2012 from Riyad Mahameed to Jean-Paul Bouhnik, and Lana Volokh RE: FW: Draft - Urgent, including 1 attachment titled "████ - simulation work - 0A.ppt" (GE_SDM_00289466 - GE_SDM_00289472). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
370	Email dated February 24, 2013 from Gil Kovalski to Reuven Brenner RE: FW: recon, including 2 attachment titled "A Novel High Sensitivity_Gambhir.pdf" and "Performance evaluation of D-SPECT- a novel SPECT system for nuclear card....pdf" (GE_SDM_00017483 - GE_SDM_00017510). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
371	Email dated September 5, 2012 from Riyad Mahameed to Gil Kovalski and Jean-Paul Bouhnik RE: Re: stargate short term plan (GE_SDM_00366835 - GE_SDM_00366835). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
372	Email dated July 6, 2016 from Jean-Paul Bouhnik to Arie Shahar and Moshe Levy RE: RE: Stargate Apollo resolution.xlsx, including 1 attachment Spreadsheet titled "collimator design for GPC July 2016.xlsx" (GE_SDM_00199580 - GE_SDM_00199583). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)
374	Publication titled "Evaluation of the D-SPECT System: Region Centric Acquisition and Tracer Kinetics" by Filipa Alexandra Pina Barrento Da Costa (2012 Hutton Publication) (GE_SDM_00739369 - GE_SDM_00739465).
384	Email dated October 10, 2012 from Jean-Paul Bouhnik to Einat Binyamin, Gil Kovalski, and Yariv Grobshtain RE: RE_GPC parameters - first guesses (GE_SDM_00366825 - GE_SDM_00366825). (HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY)